

**FILED**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

**JUN 29 2017**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**RASHAUN D. FOGLE, and  
LINVOL R. CUMMINGS**

**Defendants.**

STEPHEN C. WILLIAMS  
U.S. MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

**CASE NO.**

*17-mj-7061*

**CRIMINAL COMPLAINT**

I, Christopher W. Williams, the undersigned complainant, being duly sworn state the following is true and correct to the best of my knowledge and belief.

**Count I**

On or about June 23, 2017, in Madison County, within the Southern District of Illinois,

**RASHAUN D. FOGLE  
and  
LINVOL R. CUMMINGS,**

defendants herein, with intent to defraud, did counterfeit obligations of the United States, that is, falsely made, forged and counterfeited \$20 Federal Reserve Notes, in violation of Title 18, United States Code, Section 471.

**AFFIDAVIT**

I, Christopher W. Williams, being duly sworn, state that the following is true to the best of my knowledge and belief:

1. I, Christopher W. Williams, being duly sworn, depose and state that I am a Senior Special Agent with the United States Secret Service and have been so employed since May, 1997.

I am currently assigned to the United States Secret Service, Springfield Resident Office, Fairview Heights Domicile, where my duties include providing assistance in support of investigations involving counterfeit United States currency. During my time as a Special Agent with the United States Secret Service, I have participated in numerous counterfeit United States currency investigations and investigations, specifically, violations of Title 18, United States Code, Section 471. As a commissioned Senior Special Agent of the United States Secret Service, I am authorized to make arrests for any offense against the United States committed in my presence or for any felony cognizable under the laws of the United States, in accordance with Title 18, United States Code, Section 3056.

2. This affidavit is in support of a complaint and arrest warrant against Rashaun D. Fogle and Linvol R. Cummings, who manufactured, uttered, and possessed counterfeit \$20 Federal Reserve Notes.

3. The following information is known to me or was reported to me by law enforcement officers and other cooperating individuals. Since this affidavit is being submitted for the limited purpose of supporting a criminal complaint and arrest warrant, I have not included each and every fact known concerning this investigation.

**Investigation of Rashaun D. Fogle & Linvol R. Cummings**

4. On June 24, 2017, Officer Tony Luther #170, with the Troy Police Department (TPD) was dispatched to the TPD for a report of a Criminal Sexual Assault and Forgery that occurred at 2030 Formosa Rd, Troy, Madison County, IL. Officer Luther arrived at the TPD and met with Detective Mike Raymond and Officer Raciak.

5. Detective Raymond advised the TPD received a call from a female identifying herself as "Tina" of a Criminal Sexual Assault that occurred at the Red Roof Inn, at approximately



0400 hours on June 24, 2017. "Tina" advised she was "raped." "Tina" refused to provide any personal information and hung up with the TPD dispatcher.

6. Officer Raciak responded to the Red Roof Inn and spoke with the desk clerk. The desk clerk advised that based on her notes, a female subject named "Tina" advised her, a male subject "raped" her in a hotel room at the Red Roof Inn. The Desk Clerk further stated "Tina" asked if the Red Roof Inn had cameras, as she was in the process of reporting the incident to the Troy Police Department. The Desk Clerk further stated, based on the suspect's description, "Tina" provided, she believed the offenders, who were "described to a T" by "Tina," were staying in room # 210 and previously in room # 308. The Desk Clerk further stated the occupant of room # 308 requested a room transfer at approximately 0252 hours, as an unknown subject was repeatedly knocking on his door.

7. Detective Raymond and Officer Raciak arrived at the Red Roof Inn and responded to room # 210, the last known location of the possible male subjects. Once at room # 210, Detective Raymond knocked on the door and identified himself and agency. Detective Raymond heard multiple subjects in the room moving items and talking. Detective Raymond again knocked on the door and identified himself and agency. One skinny black male opened the door, while another heavy-set black male was in the bathroom flushing items in the toilet. Officer Raciak, while remaining outside of the hotel room, spoke with the skinny male. Detective Raymond, while outside of the room, spoke with the heavy set black male. Detective Raymond from his vantage point outside of the room, observed what appeared to be a large amount of \$20 bills in the toilet bowl, along with plastic baggies and small white rocks of what appears to be "crack" cocaine. Because of the attempt to destroy evidence, Detective Raymond entered the room to prevent further destruction. Once inside the room Detective Raymond further noticed the lid to the toilet

tank was shifted and out of place, he removed the lid and observed another large amount of U.S. currency that appeared to be counterfeit. Detective Raymond removed the uncut sheets of counterfeit from the toilet tank and placed them on the floor to prevent further destruction of the paper evidence. Detective Raymond also observed red handled scissors on the dresser. Detective Raymond observed a black printer/scanner/copier on the desk.

8. Both black males agreed to leave the room and proceed to the TPD to discuss the rape allegation. TPD Officer Hays and Assistant Chief Shownes later secured both hotel rooms.

9. Officer Raciak was notified by the hotel clerk at the Red Roof Inn, in which the occupants of room # 210 were previously in room # 308. The occupants of room # 308 requested a room change, because they were being "harassed." They abandoned room # 308 and went to room # 210.

10. Officer Raciak received a master key from the hotel clerk to gain access to room # 308, the room that had previously been occupied by the subjects and voluntarily abandoned. Officer Raciak used the key card and opened the door. Officer Raciak observed cotton in the door lock, which was used to keep the door unlocked. After securing the hotel room, he observed a condom in the toilet. He also observed paper scraps lying on the floor and throughout the room, which appeared to be trimmings of US Currency.

11. The Glen Carbon Police Department was also investigating a report of Fraud at the Walgreens, located at number 2 Cottonwood Rd, Glen Carbon, Madison County, IL. During their investigation, three (3) counterfeit \$20 Federal Reserve Notes were seized as evidence, bearing Serial Numbers: JH50161221A, MC10670852B, and MC10670852B. Your affiant identified the USC as counterfeit. Glen Carbon Police Department also provided TPD with surveillance video



of the fraudulent transaction. Officer Raciak identified the suspects as the same suspects involved in this investigation.

12. On June 24, 2017, a State of Illinois in the Circuit Court of the Third Judicial Circuit search warrant was obtained and executed on room #s 308 and 210, located at the Red Roof Inn, 2030 Formosa Road, Troy, IL, within the Southern District of Illinois.

13. Your affiant, Detectives and Officers of the TPD located a black Kodak printer/scanner/copier on the desk, a red handled pair of scissors on the dresser, a grey paper cutting board between the mattress and box spring, garbage bags containing paper scraps, cut and uncut sheets of paper containing images of \$50, \$20, and \$10 federal reserve notes, under the box springs within the bedframe, and a brown paper shopping bag containing fine laser 25% cotton ivory paper, an electrical extension cord, and scotch tape.

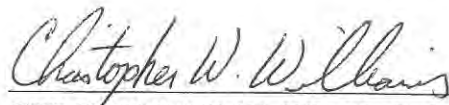
14. On June 24, 2017, your affiant conducted an interview with Linvol R. Cummings, who admitted to knowingly possessing and uttering counterfeit \$20 Federal Reserve Notes, provided to him by Rashaun D. Fogle, in the Southern District of Illinois.

15. On June 27, 2017, your affiant compared the genuine United States Currency that was discovered on the person of Rashaun D. Fogle, specifically a \$20 Federal Reserve Note, bearing serial number MG82268064B and a \$20 Federal Reserve Note bearing serial number JB36458548G, to the matching serial numbers on an uncut sheet of paper containing three counterfeit images of \$20 Federal Reserve Notes located behind the headboard of the king size bed in room # 210 of the Red Roof Inn, Troy, IL. (This sheet of uncut bills was found by hotel staff in room # 210 on June 25, 2017. The sheet was turned over to TPD.)

16. On June 26, 2017, your Affiant obtained video surveillance from the Walgreens located in Troy, Maryville, Glen Carbon, IL and St. Louis, MO (Hampton Avenue); and also the CVS located in Collinsville, IL. Both Rashaun D. Fogle and Linvol R. Cummings entered each location, with the exception of the Collinsville, IL CVS, and presented counterfeit \$20 Federal Reserve Notes, bearing serial numbers: JH50161221A and MC10670852B for payment of merchandise at each location. Linvol R. Cummings entered the Collinsville, IL CVS and presented counterfeit \$20 Federal Reserve Notes, bearing serial numbers: JH50161221A and MC10670852B for payment of merchandise at this location. On this occasion, Rashaun D. Fogle remained in the vehicle, after he had just attempted to pass a counterfeit \$20 Federal Reserve Notes at the Collinsville Walgreens, but was detected by the cashier. The Walgreens is directly across the street from the Collinsville, IL CVS.

17. The above evidence provides affiant with probable cause to believe that Rashaun D. Fogl and Linvol R. Cummings manufactured counterfeit securities of the United States in violation of Title 18, United States Code, Section 471.

FURTHER AFFIANT SAYETH NAUGHT.




CHRISTOPHER W. WILLIAMS

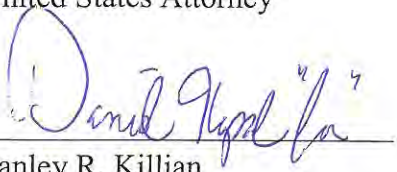
Special Agent, United States Secret Service

State of Illinois                     )  
                                              ) SS.  
County of St. Clair                )

Sworn to before me, and subscribed in my presence on the 29<sup>th</sup> day of June, 2017, at  
East St. Louis, Illinois.

  
\_\_\_\_\_  
STEPHEN C. WILLIAMS  
United States Magistrate Judge

Donald S. Boyce  
United States Attorney

  
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Ranley R. Killian  
Assistant United States Attorney